

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

**FEMHEALTH USA, INC., d/b/a
CARAFEM,**

Plaintiff,

v.

**RICKEY NELSON WILLIAMS, JR.;
BEVELYN Z. WILLIAMS, JR.;
EDMEE CHAVANNES; AT THE WELL
MINISTRIES; OPERATION SAVE
AMERICA; JASON STORMS;
CHESTER GALLAGHER; MATTHEW
BROCK; COLEMAN BOYD; FRANK
LINAM; BRENT BUCKLEY; and AJ
HURLEY;**

Defendants.

**Civil Action No. 3:22-cv-00565
JUDGE CAMPBELL**

DECLARATION OF SARAH MILLER

I, Sarah Miller, declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.

2. I have been an attorney at Bass, Berry & Sims PLLC for the last eight years and am counsel for carafem in this matter.

3. Attached as Exhibit A is a true and correct copy of a Facebook Live video uploaded by Bevelyn Williams entitled “At Planned Parenthood, About to do a operation save America” dated January 27, 2022. In the video, taken by Bevelyn Williams, Ms. Williams is accompanied by Edmee Chavannes and a number of individuals from Operation Save American, including Ken Scott, Coleman Boyd and his children, and Chet Gallagher, among others. In the video, Ms. Williams describes the predetermined plans of the group, stating that the group is “planning on

getting arrested today,” (Video 5:22), “that’s the goal” which she then goes on to record. She states that *she* is not planning to be arrested because she is pregnant. When a potential patient comes into the parking lot, Ms. Williams instructs the group to “try and stop her!” (Video 7:45). Immediately after, a group of individuals trespasses onto the property and sits on the ground, obstructing the entrance. Ms. Williams encourages the group for several minutes, stating “they are going to trespass” and instructing the group to “sit down” and “to not get up” to prevent easy arrest. She says “If I wasn’t pregnant I would be right there with them.” (Video 8:30) Ms. Williams then goes on to encourage Chet Gallagher and Ken Scott to “get down” while they are blocking the staff entrance to the facility and are ultimately arrested. (Video 10:30) She instructs others in the group to blockade, while repeatedly stating “Not in Peace!” When Mr. Scott is arrested, Ms. Williams states to a police officer “I’m his daughter!” (Video 15:00).

4. Attached as Exhibit B is a true and correct copy of the arrest report of Chester Gallagher issued on January 27, 2022 by the Lee County Sheriff’s Office describing his participation in a protest and blockade of the Planned Parenthood location in Fort Myers, Florida. The arrest report reflects that Gallagher told police officers, “take me to jail, they are killing babies” before he was placed in the back of a police vehicle.

5. Attached as Exhibit C is a true and correct copy of the Consent Judgment entered on April 29, 2021 in a case styled *People of New York by Letitia James, Attorney General v. Bevelyn Beatty and Edmee Chavannes*, Case No. 21-CV-1159 (April 29, 2021 S.D.N.Y.). The Consent Judgment prohibits Ms. Williams and Ms. Chavannes from being present in or on any portion of the sidewalk surrounding the entrance to the Planned Parenthood’s Manhattan Health Center (“the Center”) located at 26 Bleecker Street in Manhattan.

6. Attached as Exhibit D is a true and correct copy of a Facebook Live video taken by Ms. Williams on August 18, 2022. The video shows Ms. Williams and Ms. Chavannes entering Professional Brooklyn Gynecology Services, an outpatient gynecological practice that provides abortion services in Brooklyn, New York. Ms. Williams states that she is “taking advantage of our trip here” to conduct some “spiritual warfare.” (Video 0:15) Ms. Chavannes and Ms. Williams arrive at the clinic where they tell security officers that they are patients. They arrive in the waiting room where they proceed to accost patients. (Video 5:30) When personnel at the clinic instruct her to leave, she states “No, I’m not going with you, y’all are killing babies!” Ms. Williams screams “NO” over and over when instructed to leave. As she is leaving, Ms. Williams says that “New York is too big of a city, they don’t have time to catch up to us like they did in Atlanta.” (Video 11:00)

7. Attached as Exhibit E is a true and correct copy of a Facebook Live video taken by Ms. Williams on August 18, 2022. The video shows Ms. Williams and Ms. Chavannes entering the offices of Planned Parenthood of Brooklyn at 44 Court Street, Brooklyn, NY 11201. Throughout the video, Ms. Williams and Ms. Chavannes accost employees and identify them by name to their followers online. Ms. Williams and Ms. Chavannes refuse to leave for several minutes before being moved back outside.

8. Attached as Exhibit F is a true and correct copy of the 2021 Violence and Disruption Statistics Report from the National Abortion Federation. The report shows show a significant increase in stalking (600%), blockades (450%), hoax devices/suspicious packages (163%), invasions (129%), and assault and battery (128%) from 2020 to 2021.

9. Attached as Exhibit G is a true and correct copy of the docket and arrest warrant for Chester Gallagher for trespassing at Little Rock Family Planning Services, 4 Office Park, in Little Rock Arkansas on January 15, 2021.

10. Attached as Exhibit H is a true and correct copy of the Incident Report from the Mount Juliet Police in connection with a blockade involving Chet Gallagher, among others, on March 5, 2021. The report reflects that between 15 and 20 individuals were gathered in the hallways at carafem's offices and refused to leave for several hours before being arrested by police at approximately 10:00 a.m. The report notes that Coleman Boyd delivered a letter, DVD, and book, The Doctrine of the Lesser Magistrates, to the police in connection with the arrests. The report indicates that Eva Edl, Paul Place, Chet Gallagher, Health Idoni, Calvin Zastrow, and Eva Zastrow were all arrested.

11. Attached as Exhibit I is a true and correct copy of the criminal indictment for Chet Gallagher for criminal trespass issued by the Grand Jurors of Wilson County, Tennessee on January 13, 2022, in connection with his actions on March 5, 2021 at carafem.

I provide the foregoing Declaration pursuant to 28 U.S.C. § 1746 under penalty of perjury.

Dated: September 1, 2022

/s/ Sarah Miller
Sarah Miller

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing will be served this 1st day of September, 2022 by operation of the Court's CM/ECF system or via U.S. Mail, first class postage prepaid, on the parties as indicated below:

Via U.S. Mail

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Via U.S. Mail

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Via U.S. Mail

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Rickey Nelson Williams, Jr.
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At The Well Ministries, Inc.
c/o Bevelyn Williams, Registered Agent
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Via CM/ECF Notice

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/s/ Sarah B. Miller